## **BAKER & HOSTETLER LLP**

45 Rockefeller Plaza New York, NY 10111

Telephone: (212) 589-4200 Facsimile: (212) 589-4201

David J. Sheehan Nicholas J. Cremona Christa C. Turner

Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and the Estate of Bernard L. Madoff

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and Bernard L. Madoff,

Plaintiff,

v.

HARRY SMITH REVOCABLE LIVING TRUST, and LAURA ANN SMITH, as Trustee of the Harry Smith Revocable Living Trust and individually,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

**SIPA** Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-04912 (SMB)

## **CASE MANAGEMENT NOTICE**

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the "Order") [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

- 1. The Initial Disclosures shall be due: December 21, 2015.
- 2. Fact Discovery shall be completed by: March 27, 2017.
- 3. The Disclosure of Case-in-Chief Experts shall be due: June 15, 2017.
- 4. The Disclosure of Rebuttal Experts shall be due: August 14, 2017.
- 5. The Deadline for Completion of Expert Discovery shall be: September 13, 2017.
- 6. The Deadline for Service of a Notice of Mediation Referral shall be: On or before September 20, 2017.
- 7. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: On or before October 4, 2017.
- 6. The Deadline for Conclusion of Mediation shall be: On or before February 1, 2018.

Dated: New York, New York October 20, 2015

## **BAKER & HOSTETLER LLP**

By: /s/ Nicholas J. Cremona
David J. Sheehan
Nicholas J. Cremona
Christa C. Turner
45 Rockefeller Plaza
New York, NY 10111
Telephone: (212) 589-4200

Telephone: (212) 589-4200 Facsimile: (212) 589-4201

Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and the Estate of Bernard L. Madoff

## CHAITMAN LLP

By: /s/ \_Helen Davis Chaitman\_\_

465 Park Avenue

New York, New York 10022 Telephone: 888.759.1114 Facsimile: 888.759.1114 Helen Davis Chaitman

Email: hchaitman@chaitmanllp.com

Leslie Treff

Email: ltreff@chaitmanllp.com

Attorneys for Defendants